

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

In re)	
)	
FREEDOM INDUSTRIES, INC.)	Chapter 11
)	
Debtor.)	Case No. 2:14-bk-20017
)	

**MOTION FOR AN EXPEDITED HEARING ON THE MOTION FOR ENTRY OF
ORDER APPROVING SALE OF THE ASSETS OF THE POCA BLENDING BUSINESS
FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS**

The debtor and debtor-in-possession (“Freedom” or the “Debtor”) in the above-captioned case has simultaneously filed the *Expedited Motion for Entry of an Order Approving the Sale of the Assets of the Poca Blending Business Free and Clear of All Liens, Claims, Encumbrances and Interests* (the “Motion”).¹ The Debtor respectfully requests that the Court consider the Motion on an expedited basis. In support of this request, the Debtor states as follows:

1. Pursuant to Local Rule 9013-1(f), the Debtor requests expedited consideration of the Motion by the Court.

2. Expedited relief is necessary to ensure that the Buyer is able to become a turnkey operator upon the Closing of the Sale. By the end of May, the Poca Blending Business will be required to purchase significant quantities of materials necessary to fulfill its dust repellent shipment obligations to customers. If the Sale to the Buyer does not close on an accelerated basis, the Debtor’s bankruptcy estate not be able to undertake a turnkey sale, and will instead incur substantial expenses and risk in liquidating the Debtor’s Poca Blending Business and Assets.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. As a result, if the Debtor is not granted expedited consideration of this Motion, the Debtor may be irreparably damaged, and its creditors and other parties in interest will also be harmed.

4. As such, the Debtor requests an expedited hearing on the Motion.

WHEREFORE, the Debtor respectfully requests that the Court enter the accompanying Order scheduling a hearing on the Motion on an expedited basis, and for all other relief that the Court may deem just and proper.

Dated: May 5, 2014

Respectfully submitted,

BARTH & THOMPSON

Stephen L. Thompson (WV 3751)
J. Nicholas Barth (WV 255)
Barth & Thompson
P.O. Box 129
Charleston, West Virginia 25321
Telephone: (304) 342-7111
Facsimile: (304) 342-6215

and

McGUIREWOODS LLP

/s/ Mark E. Freedlander
Mark E. Freedlander (PA 70593)
Jason P. Alter (PA 307596)
625 Liberty Avenue, 23rd Floor
Pittsburgh, PA 15222
Telephone: (412) 667-6000
Facsimile: (412) 667-6050

Attorneys for the Debtor and
Debtor-in-Possession